

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

In re:
KARI ELIZABETH MCKELVEY

Case No. 13-74613-FJS
Chapter 7

Debtor

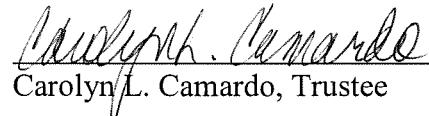
**MOTION TO COMPEL TURNOVER OF
PROPERTY OF THE ESTATE**

Comes now Carolyn L. Camardo, Chapter 7 trustee (“Trustee”) for the estate of KARI ELIZABETH MCKELVEY (“Debtor”) and moves this Honorable Court to compel the Debtor to turnover property of the estate and in support thereof states as follows:

1. KARI ELIZABETH MCKELVEY (“Debtor”) filed their voluntary Chapter 7 petition on December 12, 2013.
2. Carolyn L. Camardo was appointed as interim trustee in this case and continues to serve in that capacity.
3. Among the assets of the estate is \$1,908.98 in non-exempt bank balances (the “Bank Balance”).
4. Pursuant to her statutory duty to liquidate property of the estate pursuant to 11 U.S.C. §704, the Trustee has made demand for turnover of the non-exempt Bank Balance in the amount of \$1,908.98.
5. The Debtor has not turned over the Bank Balances.

WHEREFORE, Carolyn L. Camardo, Trustee, moves this Court for an order compelling the Debtor to turnover the non-exempt property of the estate in the amount of \$1,908.98 and for such other and further relief as is just under the circumstances.

Carolyn L Camardo, Trustee VSB #23814
5101 Cleveland Street, Suite 200
Virginia Beach, VA 23462
(757) 490-2200


Carolyn L. Camardo, Trustee

CERTIFICATE OF SERVICE

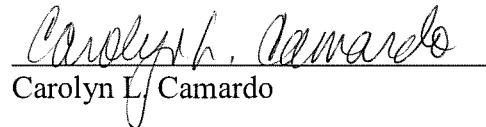
I certify that a true copy of the foregoing Motion to Compel Turnover was served by first class mail postage prepaid or via the Electronic Case Filing (ECF) system, as appropriate and as indicated on the following parties this March 24, 2014:

Office of the United States Trustee*
Federal Building, Room 625
200 Granby Street
Norfolk, Virginia 23510
[USTPRegion04.NO. ECF@usdoj.com]

Seth A. Schoenfeld*
Tidewater Law Group
468 Investors Place, Suite 202
Virginia Beach, VA 23452
[sas74a@aol.com]

Timothy R. Douglass*
Attorney for Debtor
John W. Lee, P.C.
291 Independence Boulevard, Suite 530
Pembroke #4
Virginia Beach, VA 23462

Kari Mckelvey
3812 Caribou Court
Virginia Beach, VA 23456


Carolyn L. Camardo

[* Indicates service by ECF or e-mail. All others served by First Class U.S. Mail, postage prepaid.]

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Norfolk Division

In re:)
KARI ELIZABETH MCKELVEY) Case No 13-74613-FJS
) Chapter 7
Debtor)
)
Address: 3812 Caribou Court)
Virginia Beach, VA 23456)
Last four digits of Social Security: XXX-XX-1002)

NOTICE OF MOTION TO COMPEL DEBTOR TO TURNOVER PROPERTY

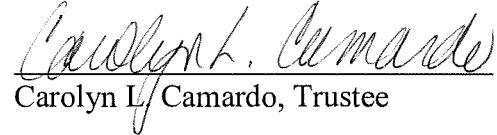
PLEASE TAKE NOTICE THAT, Carolyn L. Camardo, Chapter 7 trustee (“Trustee”) of the estate of KARI ELIZABETH MCKELVEY (“Debtor”), filed a Motion to Compel Turnover of Property pursuant to 11 U.S.C. § 542 (“Motion”), requesting an order compelling the Debtor to turnover certain non-exempt assets.

Your rights may be affected. You should read the Motion carefully and discuss it with our attorney. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the relief requested in the Motion, then you or your attorney must attend a hearing to be scheduled at a later date. You will receive a separate notice of hearing.

Under Local Rule 9013-1, unless a written objection to the Motion is filed with and received by the Clerk of the Bankruptcy Court, U.S. Bankruptcy Court, Room 400, Walter B. Hoffman Courthouse, 600 Granby Street, Norfolk, VA 23510, and received by Carolyn L. Camardo, Trustee, 5101 Cleveland Street, Suite 200. Virginia Beach, VA., **on or before seven (7) days before the scheduled hearing date**, the Court may deem any opposition waived, treat the Motion as conceded, and enter an order granting the requested relief without further notice or hearing.

Dated: March 24, 2014


Carolyn L. Camardo, Trustee

Carolyn L Camardo, Trustee –VSB # 23814
5101 Cleveland Street, Suite C
Virginia Beach, VA 23462
(757) 490-2200

CERTIFICATE OF SERVICE

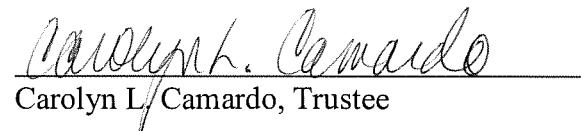
I certify that a true copy of the foregoing Notice of Motion to Compel Turnover of Property of the Estate was served by first class mail postage prepaid or via the Electronic Case Filing (ECF) system, as appropriate and as indicated on the following parties this March 24, 2014:

Office of the United States Trustee*
Federal Building, Room 625
200 Granby Street
Norfolk, Virginia 23510
[USTPRegion04.NO.ECF@usdoj.com]

Seth A. Schoenfeld*
Tidewater Law Group
468 Investors Place, Suite 202
Virginia Beach, VA 23452
[sas74a@aol.com]

Timothy R. Douglass*
Attorney for Debtor
John W. Lee, P.C.
291 Independence Boulevard, Suite 530
Pembroke #4
Virginia Beach, VA 23462

Kari McKelvey
3812 Caribou Court
Virginia Beach, VA 23456



Carolyn L. Camardo, Trustee

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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Norfolk Division

In re:
KARI ELIZABETH MCKELVEY

Case No. 13-74613-FJS
Chapter 7

Debtor

NOTICE OF HEARING

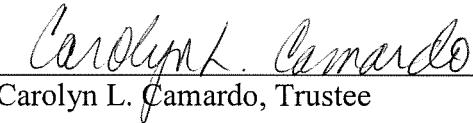
PLEASE TAKE NOTICE THAT Carolyn L. Camardo, Chapter 7 Trustee ("Trustee") of the estate of KARI ELIZABETH MCKELVEY ("Debtor"), filed a Motion to Compel Turnover of Property of the Estate (the "Motion").

Your rights may be affected. You should read the Motion carefully and discuss it with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief requested in the Motion then you or your attorney must attend a hearing to be held on **May 6, 2014 at 10:00 AM** at Judge Santoro's Courtroom, 600 Granby Street, 4th Floor, Courtroom 2, Norfolk, Virginia.

Under Local Rule 9013-1, unless a written objection to the Motion is filed with and received by the Clerk of the Bankruptcy Court, U.S. Bankruptcy Court, 600 Granby Street, Room 400, Norfolk, VA 23510, and received by Carolyn L. Camardo, Trustee, 5101 Cleveland Street, Suite 200, Virginia Beach, VA 23462, on or before seven (7) days before the scheduled hearing date, the Court may deem any opposition waived, treat the Application as conceded, and enter an order granting the requested relief without further notice or hearing.

Dated: March 24, 2014



Carolyn L. Camardo, Trustee

Carolyn L. Camardo, Trustee VSB#23814
5101 Cleveland Street, Suite 200
Virginia Beach, Virginia 23462
(757) 490-2200
(757) 490-0280 facsimile

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Notice of Hearing was served first-class mail postage prepaid or via the Electronic Case Filing (ECF)* or by e-mail* on March 24, 2014, to the following:

Office of the United States Trustee*
Federal Building, Room 625
200 Granby Street
Norfolk, Virginia 23510
[USTPRegion04.NO.ECF@usdoj.com]

Seth A. Schoenfeld*
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468 Investors Place, Suite 202
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